UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
POLLUTION REPORT

I. HEADING

Date: March 5, 1999

Subject: Pollution Report for the Removal Action at the Ohio Drum Reconditioning Co. Inc. site, Cleveland, Cuyahoga County, Ohio

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POLREP NO. 1/Initial - PRP-Lead

II. BACKGROUND

Site NO:	0526
Response Authority:	CERCLA
State Notification:	OEPA
Start Date:	08/12/96 — amended to 11/5/97
Completion Date:	

III. SITE INFORMATION

A. Incident Category

CERCLA Incident Category: Abandoned Drum Reconditioning Facility

B. Site Description

1. Site Location: The Ohio Drum Reconditioning (Ohio Drum) site is located at 3697 W. Pearl Road, Cleveland, Cuyahoga County, Ohio. Ohio Drum operated a drum washing, reconditioning, and recycling business on this site until 1981. Wastes removed from the drums were burned in one or possibly two incinerators located on site. A rinse water recycle pit used in the drum washing operations overflowed into a storm sewer. The storm sewer empties into a small tributary that flows through a swamp area and then into Big Creek. Big Creek is a tributary of the Cuyahoga River, which empties into

Lake Erie.

2. Description of Threat: In the 1970's, state and federal officials became aware of discharges from the recycle pit, through the storm sewers and swamp area, into Big Creek. Analyses of these discharges, as well as soils from the site and the swamp area, revealed the presence of polychlorinated biphenyls (PCBs), other organic compounds, phthalates, zinc, lead, and chromium. These compounds pose a direct contact threat to children from a nearby residential area and playground that play in the vicinity of the site.

C. Preliminary Assessment/Site Inspection Results

In 1979, U.S. EPA conducted an unannounced inspection of the site, finding a visible plume of contaminants entering Big Creek. Samples taken during this inspection indicated that the Ohio Drum facility was discharging pollution to the tributary, swamp area, and Big Creek. Additional sampling was conducted by the U.S. EPA in 1980 which confirmed that ethylbenzene, xylene, styrene, naphthalene, and hydrocarbons were being discharged into the tributary and swamp area.

In April 1981, a contractor was hired by U.S. EPA to excavate a bypass ditch which would prevent water from flowing through the highly contaminated swamp area, leaching contaminants into Big Creek. An earthen berm was placed along the west and south sides of the swamp area to prevent contamination from entering Big Creek.

On March 5, 1991, a site inspection was conducted at the Ohio Drum site by members of the U.S. EPA Technical Assistance Team (TAT). Ten soil samples were collected from the site which revealed the presence of polynuclear aromatic hydrocarbons (PAHs), PCBs, lead, and mercury. Open, rusted, and deteriorating drums were also observed at the site.

On March 30, 1991, the TAT returned to the site and conducted an extent of soil contamination study at the site using X-ray fluorescence (XRF). The in-situ XRF screening of the site indicated high levels of chromium, cadmium, and lead present in the site soils.

On March 3, 1993, the U.S. EPA Environmental Response Team (ERT) and members of the Response, Engineering, and Analytical Contract (REAC) collected additional samples from the swamp area. Results of this sampling indicated that the swamp area was highly contaminated with lead and PCBs, with levels as high as several thousand parts per million.

On March 29, 1996, U.S. EPA and a representative of the U.S. EPA Superfund Technical Assessment and Response Team (START) collected additional samples from the swamp area to confirm

levels of PCBs. Nine soil samples were collected from the swamp and analyzed for PCB content. Results indicated PCB levels ranging from not detected to 303 parts per million.

IV. RESPONSE INFORMATION

A. Situation

1. After 28 months of negotiations with some of the PRPs, a Consent Decree was entered in December of 1998 for the partial cleanup of the site. This PRP group agreed to excavate the PCB and lead contamination from the swamp portion of the site.

2. During the summer of 1997, the U.S. EPA completed some additional sampling on the industrial portion of the site. Surface contamination was found to be as high as 240 ppm cadmium, 1,270 ppm chromium, 17,100 ppm lead, and 1,300 ppm mercury around the old drum storage area on the industrial property; with most of this soil also testing as hazardous waste for TCLP metals (cadmium at 1.41 ppm, lead at 34 ppm, and mercury at 3.07 ppm).

B. Removal Activities

1. January 18, 1999 - PRP contractors RMT and AWS mobilize to site. Site is prepared to start the pumping of the water from the swamp. The plan is to send water to Research Oil Co. for treatment, but the amount of water in the swamp has caused them to rethink this approach.

2. January 19, 1999 - With rain in the forecast, the water pumping plan is postponed, the site is temporarily demobed.

3. February 15-20, 1999 - PRP contractors again mobilize to the site. The new plan is to pump and filter water from the swamp and store it in a frac tank. The water would then be sampled and, if clean, returned to the swamp upon completion of the sediment cleanup and backfilling.

4. February 22-23, 1999 - Excavation of contaminated sediments begin. Sediment is very wet and must be mixed with kiln dust to solidify for the landfill. Once an area is excavated to the agreed upon grade, confirmation samples are collected for analysis.

5. February 24-March 1, 1999 - Excavation continues, a total of 42 truck loads of sediment were sent to Wayne Disposal in Belleville, Michigan. Excavation to grade agreed to in the work plan is complete.

6. March 2, 1999 - Some of the confirmation samples show

contamination still present in excavation area. PRPs are discussing their options.

C. Next Steps

1. Additional excavation will be necessary.